

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MIKAYLA CHEYENNE SAVAGE,**

*Plaintiff,*

**V.**

**HARRIS COUNTY, TEXAS; SHERIFF ED GONZALES, in his official capacity; DETENTION OFFICER ARNOLDO MARTINEZ, in his individual capacity; DETENTION OFFICER ANDREW RADA, in his individual capacity; DETENTION OFFICER DANIKA MATHEWS, in her individual capacity; DETENTION OFFICER OZALYNN LOZANO, in his individual capacity; DETENTION OFFICER TRUCCELL LAGARDE, in her individual capacity; DETENTION OFFICER TAYLOR RODGERS, in his individual capacity; DETENTION OFFICER GLORIA EZEOKI, in her individual capacity; LAW ENFORCEMENT OFFICER MICHAEL THOMAS, in his individual capacity; LAW ENFORCEMENT OFFICER LAKISHA CHEATHAM, in her individual capacity; and DETENTION OFFICER TAYLOR MARILYN JOHN, in her individual capacity;**

***Defendants.***

**CIVIL ACTION NO. 4:24-cv-00666**

## JURY DEMANDED

## **NON PARTY HARRIS COUNTY'S ADVISORY REGARDING SERVICE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Harris County and files this advisory to the Court regarding the Order Granting Substitute Service (DE 79), and the return of summons for Marilyn John (DE 82), Trucell

LaGarde (DE 85) and Michael Thomas (DE 83), and respectfully advises the Court of the following:

1. On September 5, 2024—after the statute of limitations ran—Plaintiff filed her First Amended Complaint naming multiple Harris County Sheriff's Office (HCSO) detention officers, including Michael Thomas, Marilyn John, and Trucell Lagarde as Defendants. DE 52.
2. Note that on May 13, 2024, Harris County produced documents (HC\_2542 and HC\_2549) to Plaintiff indicating Detention Officers Marilyn John and Trucell Lagarde had resigned and were former employees. Exhibit A.
3. On October 7, 2024, Harris County again advised Plaintiff's counsel that John and Lagarde were not current HCSO employees. Harris County agreed to provide the last known home addresses of the former employees pursuant to a subpoena and a protective order. Exhibit B.
4. Defendant Thomas retired from HCSO on December 13, 2024. This was unbeknownst to Counsel despite exercising due diligence.
5. Subject to a protective order dated December 18, 2024 (DE 74), Harris County responded to a subpoena on December 20, 2024, and provided Plaintiff with the last known home addresses of former HCSO Detention Officers Trucell Lagarde and Marilyn John.
6. On January 24, 2025, Plaintiff filed a motion for substituted service (DE 78).
7. On January 30, 2025, the Court allowed substituted service of both current and former employees by leaving the service documents with the Harris County Jail front desk (DE 79).
8. On February 1, 2025, service documents were left at the Harris County Jail front desk for former employees John (DE 82), LaGarde (DE 85), and Thomas (DE 83). These Defendants have not received the documents from HCSO.
9. Defendants Ezeoke, Cheatham and Lozano are current HCSO employees. Exhibit C.

10. On February 6, 2025, Harris County supplemented its response to the subpoena and provided Defendant Thomas' last known home address subject to the protective order.

Date: February 7, 2025.

Respectfully submitted,

**CHRISTIAN D. MENEFEE**  
HARRIS COUNTY ATTORNEY

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DEPUTY COUNTY ATTORNEY AND FIRST  
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**NATALIE G. DELUCA**  
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By: /s/ Frank Ford  
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**CERTIFICATE OF SERVICE**

I certify that the above and foregoing Objection and Response to Subpoena from Plaintiff was served via e-mail on the following parties on February 7, 2025:

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